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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91256366
Party	Defendant Glass Processing Solutions, LLC
Correspondence Address	JEFFREY J. NEIN KEGLER, BROWN, HILL & RITTER CO., L.P.A. SUITE 1800 65 E STATE ST. COLUMBUS, OH 43215 UNITED STATES Primary Email: trademarks@keglerbrown.com No phone number provided.
Submission	Answer
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Signature	/JJN/
Date	09/23/2020
Attachments	2020.09.23 Applicant Glass Processing Solutions LLC's Answer to Notice of Opposition_91256366.pdf(14109 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Application Serial No. 88467736  
Filed: June 11, 2019  
For Mark: CENTURION

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	:	Opposition No: 91256366
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<b>MASONITE CORPORATION</b>	:	
	:	
Opposer,	:	
	:	
v.	:	
	:	
<b>GLASS PROCESSING SOLUTIONS, LLC</b>	:	
	:	
Applicant.	:	
----- X	:	

Commissioner for Trademarks  
Attn: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**APPLICANT GLASS PROCESSING SOLUTIONS, LLC'S  
ANSWER TO OPPOSER'S NOTICE OF OPPOSITION**

Applicant Glass Processing Solutions, LLC (“Applicant”, “Defendant” or “GPS”) for its answer to the Notice of Opposition filed by Opposer Masonite Corporation (“Opposer” or “Masonite”) in connection with GPS’s Trademark Application Serial No. 88467736 (the “Application”) for the CENTURION mark (the “Mark”) hereby states as follows:

1. In response to Paragraph 1 of Opposer’s Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

2. In response to Paragraph 2 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

3. In response to Paragraph 3 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

4. In response to Paragraph 4 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

5. In response to Paragraph 5 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

6. In response to Paragraph 6 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

7. In response to Paragraph 7 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

8. In response to Paragraph 8 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

9. In response to Paragraph 9 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

10. In response to Paragraph 10 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

11. In response to Paragraph 11 of Opposer's Notice of Opposition, GPS states that on June 11, 2019, GPS filed Application Serial No. 88467736 under section 1(b) of the Lanham Act for federal registration of the mark CENTURION applied to the goods "glass powder, namely, glass pozzolan for use in concrete mixes for high-strength concrete applications" in international class 19. GPS denies any allegations set forth in Paragraph 11 of Opposer's Notice of Opposition to the extent they differ from the preceding statement made in this Paragraph 11 of GPS' answer.

12. In response to Paragraph 12 of Opposer's Notice of Opposition, GPS admits that it has not yet used the CENTURION trademark in connection with "glass powder, namely, glass pozzolan for use in concrete mixes for high-strength concrete applications."

13. In response to Paragraph 13 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

14. In response to Paragraph 14 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

15. In response to Paragraph 15 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

16. In response to Paragraph 16 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

17. In response to Paragraph 17 of Opposer's Notice of Opposition, GPS denies the allegations set forth therein.

18. In response to Paragraph 18 of Opposer's Notice of Opposition, GPS states that Opposer merely incorporates previous Paragraphs 1-17 of its Notice of Opposition by reference. GPS therefore provides no additional response and incorporates its responsive paragraphs 1-17 above.

19. In response to Paragraph 19 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

20. In response to Paragraph 20 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

21. In response to Paragraph 21 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

22. In response to Paragraph 22 of Opposer's Notice of Opposition, GPS denies the allegations set forth therein.

23. In response to Paragraph 23 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

24. In response to Paragraph 24 of Opposer's Notice of Opposition, GPS denies the allegations set forth therein.

25. In response to Paragraph 25 of Opposer's Notice of Opposition, GPS denies the allegations set forth therein.

26. In response to Paragraph 26 of Opposer's Notice of Opposition, GPS states that it is without knowledge or information sufficient upon which to form a basis of belief as to the accuracy of the allegations set forth therein, and therefore denies the same.

27. In response to Paragraph 27 of Opposer's Notice of Opposition, GPS denies the allegations set forth therein.

28. In response to Paragraph 28 of Opposer's Notice of Opposition, GPS denies the allegations set forth therein.

29. GPS denies each and every allegation set forth in Opposer's Notice of Opposition that is not specifically admitted herein.

WHEREFORE, Applicant hereby respectfully requests that Opposer's Notice of Opposition be denied and that Application Serial No. 88467736 be allowed to proceed to registration.

Respectfully Submitted,

/Jeffrey J. Nein/

Jeffrey J. Nein

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*Attorney for Glass Processing  
Solutions, LLC*

Dated: September 23, 2020

Columbus, Ohio



**Certificate of Service**

The undersigned hereby certifies that a true and accurate copy of the foregoing Applicant Glass Processing Solutions, LLC's Answer to Opposer Masonite Corporation's Notice of Opposition was served by email on this 23 day of September, 2020 to the following as legal counsel for Opposer:

JOSEPH W. BERENATO, III  
BERENATO & WHITE, LLC  
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BETHESDA, MD 20817  
UNITED STATES  
uspto.filings@bw-iplaw.com

/Jeffrey J. Nein/  
Jeffrey J. Nein

**CERTIFICATE OF TRANSMITTAL**

I hereby certify that this Answer to Notice of Opposition is being electronically filed through the ESTTA System on the United States Patent and Trademark Office web site on September 23, 2020.

/Jeffrey J. Nein/  
Jeffrey J. Nein